## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MARYLAND (Greenbelt Division)

In Re:	
Ottis P. Minchew	Case No.: 24-10836-LSS Chapter 13
Debtor	

## MOTION FOR EXTENSION OF TIME TO FILE AMENDED CHAPTER 13 PLAN

Ottis P. Minchew, Debtor, by and through undersigned counsel, Eric S. Steiner, and pursuant to Fed. R. Bankr. Proc. 9006(b)(1), requests that this Honorable Court grant an extension of time to file an amended Chapter 13 Plan, and in support thereof, states:

- 1. On January 31, 2024 (the "Petition Date"), the Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code, commencing in this Court in Case No. 24-10836.
  - 2. Timothy P. Branigan was appointed Chapter 13 trustee in this matter.
- 3. On July 10, 2024, this Court entered an order denying the Debtor's Chapter 13 plan with leave to amend by July 16, 2024.
- 4. The Debtor requires additional time to file an amended Chapter 13 plan because on July 15, 2024, the U.S. Department of Education/MOHELA filed a claim (Claim No. 4), and contemporaneously herewith, the Debtor is objecting to the claim.
  - 5. No creditor or other party will be prejudiced by the Debtor's request.

WHEREFORE, Ottis P. Minchew, Debtor, requests that this Honorable Court grant an extension of time to allow the Debtor to file an amended Chapter 13 plan.

Respectfully submitted

/s/ Eric S. Steiner Eric S. Steiner, Esquire Federal Bar No. 28705

eric@steinerlawgroup.com STEINER LAW GROUP, LLC PO Box 17598, PMB 83805 Baltimore, Maryland 21297-1598 (410) 670-7060 (phone) (410) 834-1743 (fax)

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 16th day of July 2024, a copy of the foregoing was served by the Court's CM/ECF system to:

Timothy P. Branigan *Chapter 13 Trustee* 

/s/ Eric S. Steiner
Eric S. Steiner